

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

POLAROID CORPORATION,

Plaintiff and Counterclaim Defendant,

v.

HEWLETT-PACKARD COMPANY,

Defendants and Counterclaim Plaintiff.

C.A. No. 06-738-SLR

**REDACTED**

**REPLY DECLARATION OF WILLIAM J. MARDEN, JR.  
IN SUPPORT OF DEFENDANT HEWLETT-PACKARD'S MOTION TO  
PRECLUDE THE REPORT AND TESTIMONY OF POLAROID'S  
SURVEY EXPERT WALTER MCCULLOUGH**

**FISH & RICHARDSON P.C.**

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Raymond N. Scott, Jr. (#4949)  
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Wilmington, DE 19801  
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Matthew E. Bernstein (*pro hac vice*)  
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GLOVSKY AND POPEO, PC  
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Robert S. Frank, Jr. (*pro hac vice*)  
Robert M. Buchanan, Jr. (*pro hac vice*)  
Carlos Perez-Albuerne (*pro hac vice*)  
Elizabeth A. Castellani (*pro hac vice*)  
CHOATE, HALL & STEWART LLP  
Two International Place  
Boston, MA 02109  
Tel.: (617) 248-5000  
Fax: (617) 248-4000  
Emails: [rfrank@choate.com](mailto:rfrank@choate.com);  
[cperez@choate.com](mailto:cperez@choate.com)

Dated: June 23, 2008

I, William J. Marsden, Jr., declare as follows:

1. I am an attorney with Fish & Richardson P.C., counsel for Defendant Hewlett-Packard Company. I am a member of the Bar of the State of Delaware and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached hereto as Exhibit H is a true and correct copy of a letter from Adam J. Duerr at Kirkland & Ellis to Robert M. Buchanan on May 22, 2008.

3. Attached hereto as Exhibit I is a true and correct copy of a letter from Robert M. Buchanan to Colby Anne Kingsbury on May 12, 2008.

4. Attached hereto as Exhibit J is a true and correct copy of HP's Third Supplemental Response to Polaroid's First Set of Interrogatories (No. 15) and Supplemental Response to Polaroid's Third Set of Interrogatories (No. 22).

5. Attached hereto as Exhibit K is a true and correct copy of the Expert Report of Paul Fredrickson.

6. Attached hereto as Exhibit L are true and correct copies of materials produced by Kirkland & Ellis to HP, pursuant to the letter at Exhibit H, comprising the survey instrument used to ask questions about a camera and selected materials related to the survey.

7. Attached hereto as Exhibit M are true and correct copies of excerpts from the deposition of Paul Fredrickson.

8. Attached hereto as Exhibit N are true and correct copies of excerpts from the deposition of Walter McCullough.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd of June, 2008 at Wilmington, Delaware.

*/s/ William J. Marsden, Jr.*

William J. Marsden, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2008, I electronically filed with the Clerk of Court the foregoing document using CM/ECF which will send electronic notification of such filing(s) to the following counsel:

**Via Email**

Jack B. Blumenfeld (#1014)  
Julia Heaney (#3052)  
Morris, Nichols, Arsht & Tunnell, LLP  
1201 North Market Street  
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Phone: 302-658-9200  
Fax: 302-658-3989  
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Attorneys for Plaintiff and  
Counterclaim-Defendant  
Polaroid Corporation

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Michelle W. Skinner/David W. Higer  
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Attorneys for Plaintiff and  
Counterclaim-Defendant  
Polaroid Corporation

**Courtesy Copy Via Federal Express**

Michelle W. Skinner  
Kirkland & Ellis LLP  
200 East Randolph Drive  
Chicago, IL 60601  
Phone: 312-861-2000  
Fax: 312-861-2200

*/s/ William J. Marsden, Jr.*

William J. Marsden, Jr.

# Exhibit H

**KIRKLAND & ELLIS LLP**  
AND AFFILIATED PARTNERSHIPS

200 East Randolph Drive  
Chicago, Illinois 60601

To Call Writer Directly:  
312 649-3891  
aduerr@kirkland.com

(312) 861-2000  
[www.kirkland.com](http://www.kirkland.com)

Facsimile:  
(312) 861-2200  
Dir. Fax: 312 861-2200

May 22, 2008

**BY FEDERAL EXPRESS**

Robert Buchanan  
Choate Hall & Stewart, LLP  
Two International Place  
Boston, MA 02110

Re: Polaroid v. HP; C.A. No. 06-738

Dear Mr. Buchanan:

Enclosed please find a CD with Polaroid production documents bearing bates numbers POL 7542808 - POL 7544453.

Sincerely,



Adam J. Duerr  
Project Assistant

AJD

Enclosure

# Exhibit I



CHOATE HALL & STEWART LLP

Robert M. Buchanan, Jr.  
t 617-248-5027  
f 617-502-5027  
rbuchanan@choate.com

May 12, 2008

**VIA E-MAIL AND FIRST CLASS MAIL**

Colby Anne Kingsbury  
Kirkland & Ellis LLP  
200 East Randolph Drive  
Chicago, IL 60601-6636

Re: *Polaroid Corporation v. Hewlett-Packard Company*  
USDC-D.Del.-C.A. No. 06-738 (SLR)  
-- Survey Materials of Walter McCullough

Dear Colby:

I am writing to pursue an issue that arose on May 6 at the deposition of Walter McCullough. Mr. McCullough testified that he has possession of survey materials that were prepared in conjunction with this case -- but were not disclosed in his Report and were not provided to Hewlett-Packard Co. ("HP"). HP hereby demands production of these materials pursuant to Fed R. Civ. P. 26.

Mr. McCullough was retained on behalf of Polaroid to conduct a survey concerning printers and cameras. After he received the results of his initial survey, Mr. McCullough was instructed to stop work with respect to cameras and to continue forward on additional survey work with respect to printers. Mr. McCullough's Report addressed the results of both surveys with respect to printers, but did not disclose any of the survey work with respect to cameras. On behalf of Polaroid, you asserted that Mr. McCullough's survey work with respect to cameras is protected as attorney work product.

Polaroid's assertion of the work product doctrine is not correct. Mr. McCullough's initial survey addressed both cameras and printers, and Mr. McCullough necessarily considered the camera results as he went on to prepare the additional printer survey. Likewise, Mr. McCullough necessarily considered the camera results as he wrote his Report and formed his opinions. Fed. R. Civ. P. 26(a)(2)(B)(i-ii) requires that Mr. McCullough disclose in his report all materials furnished to him (for purposes of his work on this case) that he considered in the course of forming his opinions. An expert submitting a report may not withhold such

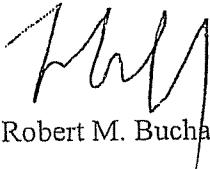
Colby Anne Kingsbury  
May 12, 2008  
Page 2

materials on the ground that he did not "rely on" them; rather, he must disclose all such materials that he "considered" in the course of forming his opinion. *See* 1993 Advisory Committee Notes to paragraph 2. Accordingly, the survey materials and results with respect to cameras should have been produced and disclosed in Mr. McCullough's Report.

If Polaroid maintains its position after review of this letter, please be advised that HP will seek the Court's assistance to compel production of these materials (followed by an opportunity for Dr. Jacoby to supplement his Expert Rebuttal Report and, to the extent appropriate, a renewed deposition of Mr. McCullough).

I am aware that you have a heavy schedule of depositions. I have some availability this week. So that we may confer on this issue pursuant to the Local Rules, please advise whether you are available for a telephone call at 10:00 a.m. Eastern on May 14, 15 or 16; or at 2:00 p.m. Eastern on May 15 or 16. Alternatively, if you are inclined to respond in writing, please let me know and I will anticipate Polaroid's response no later than May 16.

Very truly yours,



Robert M. Buchanan, Jr.

RMB:tkd

cc: Robert S. Frank, Jr.  
Daniel C. Winston  
Matthew E. Bernstein

# Exhibit J

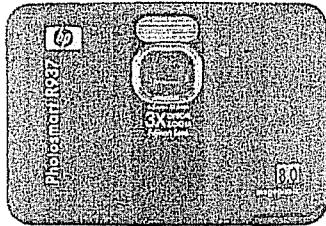
**REDACTED  
IN ITS ENTIRETY**

# Exhibit K

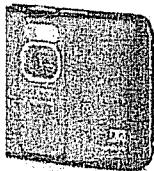
**REDACTED  
IN ITS ENTIRETY**

# Exhibit L

# HP Photosmart R937 Digital Camera



Price \$249.99



If you like state-of-the-art gadgets, our Photosmart R937 is expressly for you. It sports the coolest interactive touch screen, complete with virtual keyboard. The huge (3.6") display is a joy to use, both indoors and out. Discover how easy it can be to do everything from framing and viewing your photos to sorting and sharing them.

## Stand-out design, superior photos

- Capture superior shots with the 8 megapixel resolution; enlarge without compromising image quality
- Zero in on people and pets from afar with the 24x total zoom (3x optical, 8x digital)
- Sharpen subjects in low-light conditions with the ISO 1600 setting; enhance detail with the adaptive lighting technology and HP Steady Photo mode
- Frame, view, edit, and organize photos—indoors or out—on the bright, 3.6", interactive touch screen with virtual keyboard
- Grab and go—this remarkably thin model slips into a pocket or purse



## Bye-bye, red eye (and pet eye glow)

- Remove red-eye and unsightly pet eye glow, right in the camera
- Enhance images with colors and borders before they leave the camera
- Sort photos as you snap them with fast on-screen "tagging"; you can also mark them for e-mailing later
- Simplify editing, printing, and sharing with the included Photosmart software

## Award-winning support

- Get peace of mind with the one-year limited warranty plus Total Care advice and support
- Get product questions answered toll-free, 24 x 7, or via e-mail in as little time as an hour—at [www.HP.com/go/totalcare](http://www.HP.com/go/totalcare)

MONROE MENDELSON RESEARCH, INC.  
841 BROADWAY  
NEW YORK, NY 10003  
(800) 223-7620  
(212) 677-8833 (FAX #)

TO: SUPERVISORS  
FROM: TOM JASORKA  
RE: CAMERA SURVEY - MMR #4450C (YELLOW)  
DATE: JANUARY, 2008

Enclosed please find the following materials:

80 Screeners (YELLOW)  
70 Main Questionnaires (YELLOW)  
6 Screeners "For Briefing Only" (YELLOW)  
6 Main Questionnaires "For Briefing Only" (YELLOW)  
8 Briefing Participation/Non Disclosure Forms (BLUE)  
2 Supervisor Instructions (WHITE)  
6 Interviewer Instructions (LAVENDER)  
6 Male Interim Report Forms (WHITE)  
6 Female Interim Report Forms (WHITE)  
40 Tally Sheets (WHITE)  
4 Age Cards (WHITE)  
4 Cards Q.3 (WHITE)  
  
2 Mall Quota Sheets - Screenings (WHITE)  
20 Validation Forms (YOU MAY NOT USE ANY OTHER VALIDATION FORMS OTHER THAN THE ONES WE SENT YOU, UNLESS SPECIFICALLY AUTHORIZED BY MMR.)  
4 Camera Descriptions (YELLOW DOT)

Check that you have received the above materials in sufficient quantities. Contact Monroe Mendelsohn Research (MMR) immediately if any materials are missing.

MAIN QUESTIONNAIRES HAVE BEEN INTERCOLLATED. DO NOT DISTURB THE ORDER.

**QUOTA**

Your quota is 26 interviews, with males and females, 18 years of age or older, who have bought a digital camera in the past 12 months AND/OR think they might buy a digital camera in the next 12 months. Additionally, they may not work in the mall, must have contact lenses or eyeglasses with them if they wear them, and meet the occupation and past participation screening.

ALTHOUGH THE INTERVIEW QUOTA IS NOT BROKEN DOWN BY SEX AND AGE, THERE ARE SCREENING QUOTAS BY SEX AND AGE. A COMPLETED SCREENING IS DEFINED AS SOMEONE WHO ANSWERS AT LEAST Q.G1/G2 ON THE SCREENER. COMPLETED INTERVIEWS, TERMINATES AT Q.G1/G2, Q. H AND TERMINATES MID-INTERVIEW COUNT AS COMPLETED SCREENINGS. TERMINATES AT Q's A, C, D, E OR F DO NOT COUNT AS COMPLETED SCREENINGS.

MMR #4450C  
January, 2008

Page 2

**SUPERVISOR INSTRUCTIONS**YOUR **SCREENING QUOTAS** BY GENDER AND AGE ARE AS FOLLOWS:

AGE	SCREENING QUOTA		SCREENING QUOTA		SCREENING QUOTA	
	TOTAL QUOTA		MALE QUOTA		FEMALE QUOTA	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
18 to 34 years of age	33	31%	17	16%	16	15%
35 to 49 years of age	32	30%	16	15%	16	15%
50 years of age or older	41	39%	19	18%	22	21%
<b>TOTAL</b>	<b>106</b>	<b>100%</b>	<b>52</b>	<b>49%</b>	<b>54</b>	<b>51%</b>

NOTE: If you have not completed your quota of 26 interviews after completing your screening quota of 106 screenings, call immediately for an adjusted screening quota.

IF YOU CANNOT OBTAIN AN ADJUSTED SCREENING QUOTA, CONTINUE SCREENING BY SEX AND AGE IN THE PROPORTION SHOWN ABOVE UNTIL YOU COMPLETE 26 INTERVIEWS.

**CREW SIZE**

You will need 3-4 interviewers per shift to complete this project on schedule.

No interviewer may complete more than 7 SCREENERS (QUALIFIED AND COOPERATIVE).

No interviewer may complete more than 7 MAIN QUESTIONNAIRES.

If circumstances arise in which an interviewer may need to complete more than 7 Screeners or 7 Main Questionnaires in order to finish the study on schedule, you must contact our office first. We will inform you whether or not we can permit this.

**TALLY SHEETS**

You have been provided with White Tally Sheets on which to record all terminates.

**MALL QUOTA CONTROL SHEETS**

You have been provided with White Mall Quota Control Sheets. Post the Mall Quota Control Sheet near the area where the interviewing will take place so that interviewers can record each screening and completed main interview by sex and age group.

**METHOD OF INTERVIEWING**

All respondents are to be screened in the main mall. All qualified respondents are to be taken to a separate area, off the main mall, where a Camera Description will be shown and the interview will be conducted. Respondents must not be in either hearing or viewing distance of each other during the interview phase. All interviewers must record answers as clearly and as darkly as possible.

MMR #4450C  
January, 2008

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### SUPERVISOR INSTRUCTIONS

#### RECORDING OF INTERVIEWER NAME

You must record the name of the Screener Interviewer where indicated on the Screener and the Main Questionnaire Interviewer where indicated on the Main Questionnaire. If the Screener and Main Questionnaire Interviewer are the same person, you must still record the name in both locations.

#### FIELD DATES

Interviewing is to begin on Thursday, January 24th and must be completed no later than Sunday, January 27, 2008.

#### INTERVIEWING HOURS

WEEKDAYS: = 5:00PM - 9:30PM  
WEEKENDS: = 10:00AM - 9:30PM

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**NOTE: WEEKDAY INTERVIEWING MUST NOT START BEFORE 5:00PM! ANY INTERVIEWS NOT COMPLETED WITHIN THE TIME PERIOD INDICATED WILL NOT BE ACCEPTED.**

#### BRIEFING

You must conduct a personal briefing with all interviewers working on this study. Each interviewer must complete a practice interview, including use of the Camera Description, so that any errors can be caught before field work begins. You have been provided with Screeners and Main Questionnaires labeled "For Briefing Only" to be used for briefing purposes. Go over these "For Briefing Only" interviews while the interviewers are still at the briefing so that mistakes can be corrected before actual interviewing begins. "For Briefing Only" Screeners and Main Questionnaires must be returned to MMR with your first shipment of completed work.

#### BRIEFING PARTICIPATION/NON-DISCLOSURE STATEMENT

Each interviewer working on this study is required to sign the Briefing Participation/Non-Disclosure Statement which must be returned to MMR with your first shipment.

#### INTERIM REPORT

Fax or call MMR on Friday, January 25th by 10AM (NY Time) with a cumulative and complete report of all the information required on the Interim Report Form. Fax reports to (212) 677-8833.

#### EDITING

All work must be edited by you. Use only a green pencil for this purpose. Never change an answer, simply indicate where an error has been made. If a questionnaire is incorrect or illegible, it must be replaced.

MMR #4450C  
January, 2008

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### SUPERVISOR INSTRUCTIONS

#### VALIDATION FORMS

The Validation Forms were customized for this study. You may not substitute any other Validation Forms for the ones we sent you.

You must complete Validation Forms representing all completed interviews. Each form should represent one Screener Interviewer's work. Note: There is also a column for recording Main Questionnaire Interviewer. You must record the Main Questionnaire Interviewer for every respondent listed on the Validation Form, even if the Main Questionnaire Interviewer is the same as the Screener Interviewer.

If a respondent refuses to give a telephone number, you must try to obtain it from your local directory.

YOU ARE NOT TO VALIDATE ANY PORTION OF THIS STUDY. However, Validation Forms must be completed and returned to MMR. We will validate up to 100% of the Questionnaires.

#### VALIDATION OF WORKING PHONE NUMBER

While the Main Questionnaire is being administered to a respondent, the supervisor should dial the phone number provided by the respondent to verify that it is a working number. If it isn't, the supervisor should re-check the number with the respondent.

#### RETURN OF WORK

Monday, January 28th All Completed Interviews to date with corresponding Validation Forms, "For Briefing Only" Questionnaires, and Briefing Participation/Non Disclosure Forms are to be shipped DHL Next Day 10:30 unless otherwise instructed. **OUR DHL ACCOUNT NUMBER IS 803714331.**

**ALL MATERIALS MUST BE SEPARATED BY SCREENER INTERVIEWER WITHIN THE SHIPMENT WITH APPROPRIATE VALIDATION FORMS ON TOP OF EACH SCREENER INTERVIEWER'S WORK. WE WILL ADVISE YOU OF ADDITIONAL SHIPMENTS. DO NOT RETURN ANY OTHER MATERIALS TO MMR UNTIL INSTRUCTED TO DO SO.**

#### BILLING

Submit a bill, addressed to Thomas Jasorka, on your own letterhead, within one week of completion of this study.

MONROE MENDELSON RESEARCH, INC.  
 841 BROADWAY  
 NEW YORK, NEW YORK 10003  
 (800) 223-7620  
 (212) 677-8833 (FAX #)

MMR #4450C  
 January, 2008

Camera Survey

**INTERVIEWER INSTRUCTIONS**  
**YELLOW QUESTIONNAIRE**

**I. METHOD OF INTERVIEWING**

All respondents are to be screened in the main mall. All qualified respondents are to be taken to a separate area off the main mall where a Camera Description will be shown and the interview will be conducted. Respondents must not be in hearing or viewing distance of each other.

**ALL INTERVIEWS MUST BE SIGNED BY THE RESPONDENT.**

**II. ELIGIBLE RESPONDENT**

The eligible respondent is a male or female who:

**BE SURE TO  
 RECORD  
 THESE  
 ACCURATELY.**  
  
**WE VALIDATE  
 EACH  
 RESPONDENT  
 ON EVERY  
 ONE OF  
 THESE  
 QUALIFI-  
 CATIONS**

- QA. Does not work in the mall.
- QB/C. Has eye wear with him/her, if required.
- QD. Is 18 years of age or older and qualifies for an Open Screening Quota.
- QE. Neither respondent, nor anyone in respondent's household works for an advertising agency, marketing research firm or in the production, distribution or sale of computers, cameras or printers.
- QF. Has not been interviewed in any mall in the past three months.
- QG1/2. Has bought a digital camera in the past 12 months AND/OR thinks he/she might buy a digital camera in the next 12 months.
- QH. Is willing to participate.

A Screening Questionnaire has been provided to determine eligibility.

**III. FIELD DATES**

Interviewing is to begin on Thursday, January 24th and be completed by Sunday, January 27th, 2008. Your supervisor will assign the specific hours you are to work.

**INTERVIEWERS, PLEASE NOTE:** Your supervisor has accepted this assignment with the understanding that you will be paid on an hourly basis. MMR strictly forbids the practice of interviewers being paid on a "flat rate" (i.e., price per interview) basis.

No interviewer may complete more than 7 Screeners.

No interviewer may complete more than 7 Main Questionnaires.

### INTERVIEWER INSTRUCTIONS

#### **IV. MALL QUOTA SHEETS**

Mall Quota Control Sheets will be posted in the Mall near the area where the interviewing is taking place. After a screening/interview has been completed, record it in the appropriate space under the appropriate column on the Mall Quota Control Sheet.

#### **V. TALLY SHEETS**

You have been provided with Tally Sheets on which to record all terminates.

#### **VI. VALIDATION FORMS**

Note that Validation Forms are customized for this study and those sent are the only ones to use.

Complete, in ink, a Validation Form, representing all completed interviews. Each form should represent one Screener Interviewer's work. Note: There is also a column for recording Main Questionnaire Interviewer. You must record the Main Questionnaire Interviewer for every respondent listed on the Validation Form, even if the Main Questionnaire Interviewer is the same as the Screener Interviewer.

List each completed interview in sequential order. Fill in (PRINT) the respondent's full name, address and telephone number. Return the form(s) to your supervisor together with the corresponding completed work.

Be sure to obtain respondent's telephone number. If it is not given, obtain the phone number from your local directory, if listed.

**NOTE: WE WILL BE VALIDATING UP TO 100% OF THE INTERVIEWS ON THIS STUDY**

#### **VII. MAIN QUESTIONNAIRES**

MAIN QUESTIONNAIRES HAVE BEEN INTERCOLLATED. USE THEM IN THE ORDER THEY WERE SHIPPED.

#### **VIII. QUESTIONNAIRE INSTRUCTIONS**

These instructions are in addition to those on the questionnaire. Read these instructions with a copy of the questionnaire in front of you. All questions are straightforward. Questionnaire instructions, including all skip patterns, are printed ALL IN CAPS. ALL SCREENERS AND QUESTIONNAIRES MUST BE COMPLETED AS CLEARLY AND DARKLY AS POSSIBLE. DO NOT ALLOW THE RESPONDENT TO LOOK AT OR SEE THE SCREENER OR MAIN QUESTIONNAIRE AT ANY TIME.

##### **SCREENER:**

Q.A: Record response. If "Yes", terminate and tally. Erase and re-use Screener. If "No", continue.

Q.B: If "Yes", continue with Q.C. If "No", skip to Q.D.

Q.C: ASK IF "Yes" IN Q.B. If "Yes", SAY: "During this interview, please feel free to use them whenever you need them" and continue. If "No", terminate and tally. Erase and re-use Screener.

**INTERVIEWER INSTRUCTIONS**

Q.D: HAND RESPONDENT AGE CARD. If "Under 18 years of age" or "Refused", terminate and tally. Erase and re-use Screener. All others, check quota. If, open, continue with QE. Otherwise, terminate and tally. Erase and re-use Screener. TAKE BACK AGE CARD.

Q.E: If "No", continue. If "Yes", terminate and tally. Erase and re-use Screener.

Q.F: If "No", continue. If "Yes", terminate and tally. Erase and re-use Screener.

Q.G1/2: If no mention of "A digital camera" in either Q.G1 OR Q.G2, terminate and tally. Erase and re-use Screener. If "A digital camera", is mentioned in either Q.G1 OR Q.G2 OR BOTH, continue.

Q.H: If "Yes", take respondent back to interviewing area. If "No", terminate and tally. Erase and re-use Screener.

**RECORD DAY OF WEEK, DATE AND TIME OF DAY SCREENER WAS COMPLETED IN THE BOX ON SCREENER PAGE S2.**

**RECORD RESPONDENT'S NAME, COMPLETE ADDRESS, AND PHONE NUMBER IN THE BOX ON SCREENER PAGE S3.**

**TAKE RESPONDENT TO INTERVIEWING AREA.  
MAIN QUESTIONNAIRE:**

**RECORD RESPONDENT'S NAME IN THE BOX ON MAIN QUESTIONNAIRE PAGE M1.**

Read statement.

**HAND RESPONDENT CAMERA DESCRIPTION (YELLOW DOT) AND ALLOW HIM/HER SUFFICIENT TIME TO REVIEW IT THOROUGHLY BEFORE ASKING Q.1. LEAVE THE CAMERA DESCRIPTION WITH RESPONDENT.**

Q.1: If "Price would be the same"/"Don't know", END INTERVIEW. If "Would cost less", ask Q.2.

Q.2: Record verbatim response. If, Don't know", ask Q. 3. All other responses in Q.2, END INTERVIEW.

Q.3: ASK ONLY IF "DON'T KNOW IN Q.2. HAND RESPONDENT CARD Q.3. Record response. TAKE BACK CARD Q.3. THANK RESPONDENT AND END INTERVIEW.

Make sure that all required information has been recorded on the Screener.

**INTERVIEWER INSTRUCTIONS**

**UPON COMPLETION BE SURE TO RECORD (PRINT) MAIN QUESTIONNAIRE  
INTERVIEWER WHERE INDICATED ON THE MAIN QUESTIONNAIRE.**

**SIGN THE INTERVIEWER CERTIFICATION ON PAGE M2.**

**HAVE THE RESPONDENT DATE AND SIGN "RESPONDENT INTERVIEW VERIFICATION"  
ON PAGE M3.**

**STAPLE SCREENER TO TOP OF THE MAIN QUESTIONNAIRE.**

**IX. GENERAL INSTRUCTIONS**

In order to obtain an interview of the highest quality, we must insist on the implementation of the following techniques:

1. If the respondent refuses to answer a question indicate this by writing "REF" (standing for "Refused") in the area where the answer is to be recorded.
2. Questions must be asked word-for-word, exactly as they are printed on the questionnaire or screener.
3. Questions must be asked in the order they appear on the questionnaire.
4. There should not be any explanations, interpretations or additions to a question. If a respondent does not understand a question, merely re-read it. DO NOT EXPLAIN IT.
5. When appropriate, place an "X" in the box next to the answer given by the respondent.
6. If it is necessary to make a correction, cross out the original answer and then circle the correct number or box.
7. Write legibly AND AS DARK AS POSSIBLE. If we cannot read your writing, your work cannot be used.
8. Immediately after the close of the interview, the questionnaire is to be checked for completeness, legibility, etc. Incomplete or illegible questionnaires will have to be replaced.

TO: Monroe Mendelsohn Research, Inc.  
841 Broadway, 8th Floor  
New York, NY 10003-4704

RE: JOB #4450C – Camera Survey

DATE: January, 2008

**BRIEFING PARTICIPATION/NON-DISCLOSURE STATEMENT**

This is to confirm that I, \_\_\_\_\_ currently working for (FIELD SERVICE NAME/CITY) \_\_\_\_\_ have been thoroughly briefed on Study #4450C – Camera Survey.

I attest that I:

1. Have been personally and thoroughly briefed on this study.
2. Have conducted a minimum of 1 practice interview on this study.
3. Completely understand ALL DETAILS of this study.
4. Have read the interviewer's instructions thoroughly.

Further, I understand the importance of maintaining security and not discussing the subject with ANYONE - including friends and family. I agree to maintain the standards you have requested.

---

Signature of Interviewer

---

Signature of Supervisor

---

Date

MONROE MENDELOHN RESEARCH, INC.  
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MMR #4450C  
 January, 2008

CAMERA SURVEY

VALIDATION QUESTIONNAIRE

INTRODUCTION: Hello, my name is \_\_\_\_\_. Our records indicate that you recently participated in a survey. I'm not trying to sell you anything, I just need to ask you a few short questions about that survey.

1. Did you recently participate in an interview in a shopping mall where you were shown a description of a digital camera, asked to read it and then asked some questions about it?

Yes.....(  ) No.....(  )---MAKE NOTE

2. Do you work in that mall?

Yes.....(  )---MAKE NOTE No.....(  )

3. Prior to this interview, had you been interviewed in any mall in the past three months?

Yes.....(  )---MAKE NOTE No.....(  )

4. Do you or does anyone in your household work for an advertising agency, marketing research firm or in the production, distribution or sale of computers, cameras or printers?

Yes.....(  )---MAKE NOTE No.....(  )

5. When you were interviewed, did you say that you had either bought a digital camera in the past 12 months and/or thought you might buy a digital camera in the next 12 months?

Yes.....(  ) No.....(  )---MAKE NOTE

6. Finally, are you 18 years of age or older?

Yes.....(  ) No.....(  )---MAKE NOTE

The following abbreviations are to be used:

NA =	No answer
BZ =	Busy
DS =	Disconnect/Not in service
AM =	Answering machine
RRN# =	Respondent reported not at that number
RF =	Refused to complete validation questions
CB =	Callback
RNA =	Respondent not available
CM =	Complete
LB =	Language barrier

## Validation Report For Job # 4450 CAMERA

	Column 1	2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)			
	Numbers Reached											
	COMPLETES		DS/ RRN#		Respondent Contacts			Percent Validated			Explanation of Notation/ Action Taken	
	With	Phone #	Total	Refused	Total	Notations	Notations	1+	Percent		ID #	Pulled
<b>4450 CAMERA</b>												
<b>PHOENIX</b>	<b>52</b>	<b>52</b>	<b>36</b>	<b>5</b>	<b>31</b>	<b>30</b>	<b>1</b>	<b>60%</b>	<b></b>	<b></b>	<b></b>	<b>1</b>
LINDA BURBANK	10	10	6	1	5	5	0					
SOFIA CINCO	14	14	13	3	10	10	0					
MARLENE LOPEZ	14	14	8	0	8	7	1					
ANGEL REYES	11	11	7	1	6	6	0					
SHANNON ROGERS	3	3	2	0	2	2	0					
<b>DETROIT</b>	<b>55</b>	<b>55</b>	<b>41</b>	<b>11</b>	<b>30</b>	<b>27</b>	<b>3</b>	<b>55%</b>	<b></b>	<b></b>	<b></b>	<b>3</b>
ANN MARIE HERUBIN	5	5	2	0	2	2	0					
ROBERTA JENSEN	5	5	5	0	5	4	1					
TARISSA KING	14	14	12	3	9	8	1					
ELAINE MCLOUD	7	7	7	1	6	5	1					
JOYCE RAMA	16	16	9	2	7	7	0					
DONNIE HOWARD	8	8	6	5	1	1	0					
<b>SEATTLE</b>	<b>53</b>	<b>53</b>	<b>28</b>	<b>1</b>	<b>27</b>	<b>27</b>	<b>0</b>	<b>51%</b>	<b></b>	<b></b>	<b></b>	<b>0</b>
GLORIA ANDERSON	6	6	2	0	2	2	0					
APRIL CIPRIANO	14	14	9	0	9	9	0					
TED HUBBARD	19	19	10	1	9	9	0					
BETH KODAD	8	8	3	0	3	3	0					
SCOTT HUNTER	6	6	4	0	4	4	0					
<b>PADUCAH</b>	<b>50</b>	<b>50</b>	<b>36</b>	<b>8</b>	<b>28</b>	<b>28</b>	<b>0</b>	<b>56%</b>	<b></b>	<b></b>	<b></b>	<b>0</b>
SARAH ALSIP	12	12	11	3	8	8	0					
JENNA FOSTER	5	5	4	0	4	4	0					
CHRISTY GILMORE	13	13	8	2	6	6	0					
CRYSTAL LEWIS	12	12	10	2	8	8	0					
ROBBIE NETHERLAND	8	8	3	1	2	2	0					

DS = Disconnected service.

RRN# = Reported respondent not at number given.

## Validation Report For Job # 4450 CAMERA

	Column 1	2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)			
	Numbers Reached											
	COMPLETES			DS/ RRN#			Respondent Contacts					
	Total	With	Phone #	Total	Refused	Total	Notations	Notations	Validated	Percent	Explanation of Notation/	Number Pulled
<b>EAST MEADOW</b>	<b>52</b>	<b>52</b>	<b>40</b>	<b>2</b>	<b>38</b>	<b>37</b>	<b>1</b>	<b>73%</b>				<b>4</b>
ALICE BRUNO	2	2	0	0	0	0	0	0			Interview Removed	217
DEBBIE CAPO	7	7	5	0	5	5	5	5			Interview Removed	218
JOAN CLARK	3	3	1	0	1	1	1	1				
CINDY DILUCIA	1	1	1	1	0	0	0	0			Interview Removed	216
LAURETTE KAUFMANN	14	14	14	0	14	14	0	14	0			
PEGGY LOCKWOOD	10	10	7	0	7	0	7	6	1		NO TO CAMERA	140
IRENE LOTRUGLIO	3	3	2	0	2	0	2	2	0			
ROSANNE PALMIERI	6	6	5	0	5	5	5	5	0			
GRACE RICCI	6	6	5	1	4	4	4	4	0			
<b>TRUMBULL</b>	<b>56</b>	<b>56</b>	<b>48</b>	<b>9</b>	<b>39</b>	<b>39</b>	<b>0</b>	<b>70%</b>				<b>0</b>
ANDREW COLAD	16	16	13	2	11	11	11	11	0			
RYAN DEMSEY	10	10	10	1	9	9	9	9	0			
KAMESHA ELSENPETER	7	7	5	3	2	2	2	2	0			
JESSICA SMITH	11	11	8	0	8	8	8	8	0			
BILLIE JO DUNPHY	4	4	4	0	4	4	4	4	0			
LISA HARRIGAN	4	4	4	2	2	2	2	2	0			
LASHANNA ELSENPETER	4	4	4	1	3	3	3	3	0			

DS = Disconnected service.

RRN# = Reported respondent not at number given.

Validation Report For Job # 4450 CAMERA

Column 1		2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)
4450 CAMERA									
Numbers Reached									
COMPLETEES									
DS/ RN#/ Refused									
With Phone #									
Total Refused									
Total									
CLEVELAND									
KRYSTIN COLEMAN	2	2	2	0	2	2	0	0	0
FELICITAS FISCHER	4	4	3	0	3	3	0	0	0
KEVIN KELLEY	9	9	6	1	5	5	0	0	0
SARAH MAYER	17	17	11	3	8	8	0	0	0
CASSIE OKENKA	7	7	7	0	7	7	0	0	0
STEVE POWERS	8	8	5	3	2	2	0	0	0
STEVE ROBBINS	5	5	5	0	5	5	0	0	0
JOE SALA	4	4	4	0	4	4	0	0	0

DS = Disconnected service.  
RRN# = Reported respondent not at number given.

## Validation Report For Job # 4450 CAMERA

	Column 1	2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)	
	Numbers Reached									
	COMPLETES		DS/	Respondent Contacts						Number
	Total	Phone #	Total	Refused	Total	Notations	1+	Percent	Explanation of Notation/	
	Total	With	Total	RRN#	Total	Notations	Notations	Validated	Action Taken	ID #
<u>RALEIGH</u>	<u>52</u>	<u>52</u>	<u>36</u>	<u>15</u>	<u>21</u>	<u>16</u>	<u>5</u>	<u>40%</u>		<u>16</u>
MORGAN BRIGHT	8	8	5	0	5	5	0			
TRACY BARRETT	12	12	9	7	2	1	1			
KAY MITCHELL	5	5	5	3	2	2	2	0		
WANDA FLANAGAN	10	10	6	2	4	2	2		NO TO CAMERA	301
LISA MCCABE	7	7	5	0	5	3	2		NO TO CAMERA	474
NEIL PEEDIN	6	6	5	3	2	2	0		NO TO CAMERA	489
CELESTE BENJAMIN	4	4	1	0	1	1	0		SECURITY	487
<b>GRAND TOTAL</b>	<b>426</b>	<b>426</b>	<b>308</b>	<b>58</b>	<b>250</b>	<b>240</b>	<b>10</b>	<b>59%</b>		<b>24</b>

DS = Disconnected service.

RRN# = Reported respondent not at number given.

AGE CARD

- A. UNDER 18 YEARS OF AGE
- B. 18-34 YEARS OF AGE
- C. 35-49 YEARS OF AGE
- D. 50 YEARS OF AGE AND OVER

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AGE CARD

- A. UNDER 18 YEARS OF AGE
- B. 18-34 YEARS OF AGE
- C. 35-49 YEARS OF AGE
- D. 50 YEARS OF AGE AND OVER

## CAMERA SURVEY

## SCREENER

Screener Interviewer: \_\_\_\_\_ 4- 5- 6- 7-

APPROACH MALES AND FEMALES WHO APPEAR TO BE  
18 YEARS OF AGE OR OLDER

**INTRODUCTION:** Hello, I'm \_\_\_\_\_ representing Monroe Mendelsohn Research, a survey research company. We're conducting a survey in this area and your participation would be especially important to us. We are not selling anything. This is only a survey.

A. First, do you work in this mall?

Yes ..... [ ]1 → TERMINATE AND TALLY. RE-USE SCREENER.

8-

No ..... [ ]2 → CONTINUE

B. Do you usually wear contact lenses or eyeglasses when you read?

Yes ..... [ ]1 → ASK Q.C

9-

No ..... [ ]2 → SKIP TO Q.D

C. (IF "Yes" IN Q.B, ASK:) Do you have them with you today?

Yes ..... [ ]1 → SAY: "During this interview, please feel free to use them whenever you need them"  
AND CONTINUE.

10-

No ..... [ ]2 → TERMINATE AND TALLY. RE-USE SCREENER.

D. Which letter on this card (HAND RESPONDENT AGE CARD) includes your age? (RECORD RESPONDENT'S AGE UNDER THE APPROPRIATE GENDER COLUMN.)

11-12

MALE	FEMALE
------	--------

A. Under 18 .....	[ ]1	[ ]1	→ TERMINATE AND TALLY. RE-USE SCREENER.
-------------------	------	------	---

B. 18-34 .....	[ ]2	[ ]2	→ CHECK AGE/GENDER SCREENING QUOTA. IF OPEN, CONTINUE WITH Q.E. OTHERWISE, TERMINATE AND TALLY. RE-USE SCREENER.
C. 35-49 .....	[ ]3	[ ]3	→ CHECK AGE/GENDER SCREENING QUOTA. IF OPEN, CONTINUE WITH Q.E. OTHERWISE, TERMINATE AND TALLY. RE-USE SCREENER.
D. 50 and over .....	[ ]4	[ ]4	

Refused .....	[ ]5	[ ]5	→ TERMINATE AND TALLY. RE-USE SCREENER.
---------------	------	------	---

(TAKE BACK AGE CARD.)

E. Do you or does anyone in your household work for an advertising agency, marketing research firm, or in the production, distribution or sale of computers, cameras or printers?

Yes ..... [ ]1 → TERMINATE AND TALLY. RE-USE SCREENER.

13-

No ..... [ ]2 → CONTINUE

F. Have you been interviewed in this or any other mall in the past three months?

Yes ..... [ ]1 → TERMINATE AND TALLY. RE-USE SCREENER.

14-

No ..... [ ]2 → CONTINUE

G1. Which of the following products, if any, have you bought in the past 12 months? (READ LIST. RECORD ALL "Yes" MENTIONS UNDER COL Q.G1 BELOW. IF RESPONDENT DID NOT BUY ANY OF THE LISTED PRODUCTS, 'X' "NONE OF THESE.")

G2. And, which of the following products do you think you might buy in the next 12 months? (READ LIST. RECORD ALL "Yes" MENTIONS UNDER COL Q.G2 BELOW. IF RESPONDENT DOESN'T THINK HE/SHE MIGHT BUY ANY OF THE LISTED PRODUCTS, 'X' "NONE OF THESE.")

	<u>Q.G1</u>	<u>Q.G2</u>	
	Bought In Past 12 Months	Might Buy In Next 12 Months	
A laptop computer .....	[ ]1	[ ]1	
A color ink jet printer .....	[ ]2	[ ]2	
A digital camera .....	[ ]3 ↓ CONTINUE	[ ]3 ↓ CONTINUE	

15-16

(DO NOT None of these ..... [ ]0 [ ]0  
READ)

**RESPONDENTS MUST ANSWER "A digital camera" IN Q.G1 AND/OR Q.G2 TO CONTINUE.**

**IF NOT "A digital camera" IN EITHER Q.G1 OR Q.G2, TERMINATE AND TALLY. RE-USE SCREENER.**

H. I have a few more questions I'd like to ask you. The interview will take about 5-10 minutes and I think you will find it interesting. Are you willing to help us out?

Yes ..... [ ]1 → TAKE RESPONDENT TO INTERVIEWING AREA.

17-

No ..... [ ]2 → THANK RESPONDENT AND SAY, "Perhaps some other time  
you'll be able to participate. Thanks anyway!"  
TERMINATE AND TALLY. RE-USE SCREENER.

Day of the Week: \_\_\_\_\_ Date: \_\_\_\_\_

Time of Day Screener Completed: \_\_\_\_\_

RESPONDENT'S NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY: \_\_\_\_\_

STATE: \_\_\_\_\_ ZIP: \_\_\_\_\_

PHONE: (        ) \_\_\_\_\_

CARD Q.3

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

- A. Less than \$1.00
- B. \$1.00 - \$4.99
- C. \$5.00 - \$9.99
- D. \$10.00 - \$19.99
- E. \$20.00 or more

---

CARD Q.3

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

- A. Less than \$1.00
- B. \$1.00 - \$4.99
- C. \$5.00 - \$9.99
- D. \$10.00 - \$19.99
- E. \$20.00 or more

YELLOW

**CAMERA SURVEY  
MAIN QUESTIONNAIRE**

4-1

RESPONDENT'S NAME: \_\_\_\_\_

I'd like you to look at this description of a digital camera and review the information as if you were considering whether or not to buy it. After you have reviewed the product description, I will ask you a few questions. If you don't know the answer to any of my questions, please don't hesitate to say that.

HAND RESPONDENT CAMERA DESCRIPTION (YELLOW DOT) AND ALLOW HIM/HER SUFFICIENT TIME TO REVIEW IT THOROUGHLY BEFORE ASKING Q.1.  
AFTER RESPONDENT HAS REVIEWED THE CAMERA DESCRIPTION,  
**LEAVE THE CAMERA DESCRIPTION WITH THE RESPONDENT.**

1. This particular digital camera contains a feature called, "Adaptive Lighting Technology". Adaptive Lighting Technology is a breakthrough technology that enables cameras to produce photos that look more like what people see with their own eyes. It accomplishes this by balancing relationships between bright and dark areas in a photo, preserving gentle contrasts by smoothing out harsh contrasts.

If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

Would cost less ..... [ ]1 → **ASK Q.2**

5-

Price would be the same ..... [ ]2 → **END INTERVIEW**Don't know ..... [ ]3 → **END INTERVIEW**

2. About how much less do you think the model without the Adaptive Lighting Technology feature would cost? **(RECORD VERBATIM RESPONSE.)**

Don't know ..... [ ]1 → **ASK Q.3**

6 - 8

YELLOW

3. (IF "DON'T KNOW" IN Q.2 HAND RESPONDENT CARD Q.3 AND ASK:) Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

9-

- A. Less than \$1.00 ..... [ ]1
- B. \$1.00 - \$4.99 ..... [ ]2
- C. \$5.00 - \$9.99 ..... [ ]3
- D. \$10.00 - \$19.99 ..... [ ]4
- E. \$20.00 or more ..... [ ]5
- Don't know (RECORD IF VOLUNTEERED) ..... [ ]6

(TAKE BACK CARD Q.3.)

THANK RESPONDENT AND END INTERVIEW.

MAKE SURE RESPONDENT INFORMATION (NAME, ADDRESS, PHONE NUMBER)  
ON SCREENER IS COMPLETE.

Main Questionnaire Interviewer: \_\_\_\_\_  
(10-13)

INTERVIEWER CERTIFICATION:

*I certify that I conducted this interview in accordance with my interviewer instructions.*

INTERVIEWER'S SIGNATURE: \_\_\_\_\_

HAVE RESPONDENT DATE AND SIGN "RESPONDENT INTERVIEW VERIFICATION"  
ON NEXT PAGE.

**RESPONDENT INTERVIEW VERIFICATION**

Today's Date: \_\_\_\_\_

I was interviewed on this date. During the interview I was shown a product description and questioned about it. I understand that all of the information I have supplied will remain confidential.

---

Respondent Signature

## CAMERA SURVEY MAIN QUESTIONNAIRE

4-2

RESPONDENT'S NAME: \_\_\_\_\_

I'd like you to look at this description of a digital camera and review the information as if you were considering whether or not to buy it. After you have reviewed the product description, I will ask you a few questions. If you don't know the answer to any of my questions, please don't hesitate to say that.

HAND RESPONDENT CAMERA DESCRIPTION (YELLOW DOT) AND ALLOW HIM/HER SUFFICIENT TIME TO REVIEW IT THOROUGHLY BEFORE ASKING Q.1.  
AFTER RESPONDENT HAS REVIEWED THE CAMERA DESCRIPTION,  
**LEAVE THE CAMERA DESCRIPTION WITH THE RESPONDENT.**

1. This particular digital camera contains a feature called, "Adaptive Lighting Technology". Adaptive Lighting Technology is a breakthrough technology that enables cameras to produce photos that look more like what people see with their own eyes. It accomplishes this by balancing relationships between bright and dark areas in a photo, preserving gentle contrasts by smoothing out harsh contrasts.

If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that the price would be the same as the model with the Adaptive Lighting Technology feature, or would that model cost less than the model with the Adaptive Lighting Technology feature?

Price would be the same ..... [ ]1 → **END INTERVIEW**

5-

Would cost less ..... [ ]2 → **ASK Q.2**

Don't know ..... [ ]3 → **END INTERVIEW**

2. About how much less do you think the model without the Adaptive Lighting Technology feature would cost? **(RECORD VERBATIM RESPONSE.)**

---

Don't know ..... [ ]1 → **ASK Q.3**

6 - 8

3. (IF "DON'T KNOW" IN Q.2 HAND RESPONDENT CARD Q.3 AND ASK:) Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

9-

- A. Less than \$1.00 ..... [ ]1
- B. \$1.00 - \$4.99 ..... [ ]2
- C. \$5.00 - \$9.99 ..... [ ]3
- D. \$10.00 - \$19.99 ..... [ ]4
- E. \$20.00 or more ..... [ ]5
- Don't know (RECORD IF VOLUNTEERED) ..... [ ]6

(TAKE BACK CARD Q.3.)

THANK RESPONDENT AND END INTERVIEW.

MAKE SURE RESPONDENT INFORMATION (NAME, ADDRESS, PHONE NUMBER)  
ON SCREENER IS COMPLETE.

Main Questionnaire Interviewer: \_\_\_\_\_  
(10-13)

INTERVIEWER CERTIFICATION:

*I certify that I conducted this interview in accordance with my interviewer instructions.*

INTERVIEWER'S SIGNATURE: \_\_\_\_\_

HAVE RESPONDENT DATE AND SIGN "RESPONDENT INTERVIEW VERIFICATION"  
ON NEXT PAGE.

## RESPONDENT INTERVIEW VERIFICATION

Today's Date: \_\_\_\_\_

I was interviewed on this date. During the interview I was shown a product description and questioned about it. I understand that all of the information I have supplied will remain confidential.

**Respondent Signature**

MMR # 4450 C

**CAMERA SURVEY****PRELIM RESULTS 1/30/08**

Q.1: ...If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

<b>Total Respondents</b>		
	(195) #	(100) %
Would cost less .....	166	85
Price would be the same .....	22	11
Don't know .....	7	4

Q.2: About how much less do you think the model without the Adaptive Lighting Technology feature would cost?

<b>Total Respondents</b>		
	(195) #	(100) %
Don't know .....	31	16

**See verbatims for rest of open ended responses**

Q.3: Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

<b>Total Respondents</b>		
	(195) #	(100) %
A. Less than \$1.00 .....	-	-
B. \$1.00 - \$4.99 .....	-	-
C. \$5.00 - \$9.99 .....	1	1
D. \$10.00 - \$19.99 .....	7	4
E. \$20.00 or more .....	22	11
Don't know .....	1	1

MMR # 44500  
CAMERA SURVEY: TOTAL RESULTS PRIOR TO VALIDATION 2/6/08

Q.1: ...If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

Total Respondents		
	(412) #	(100) %
Would cost less .....	349	85
Price would be the same .....	50	12
Don't know .....	13	3

Q.2: About how much less do you think the model without the Adaptive Lighting Technology feature would cost?

Total Respondents		
	(412) #	(100) %
Don't know .....	61	15
MEAN	\$45.26	
MEDIAN	\$45.00	

**See verbatims for individual responses**

Q.3: Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

Total Respondents		
	(412) #	(100) %
A. Less than \$1.00 .....	-	-
B. \$1.00 - \$4.99 .....	1	*
C. \$5.00 - \$9.99 .....	4	1
D. \$10.00 - \$19.99 .....	13	3
E. \$20.00 or more .....	40	10
Don't know .....	3	1

\* = Less than 0.5%

Q.1: ...If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

Total Respondents		
	(402) #	(100) %
Would cost less .....	345	86
Price would be the same .....	45	11
Don't know .....	12	3

Q.2: About how much less do you think the model without the Adaptive Lighting Technology feature would cost?

Total Respondents		
	(402) #	(100) %
Don't know .....	59	15
MEAN	\$44.93	
MEDIAN	\$50.00	

**See verbatims for individual responses**

Q.3: Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

Total Respondents		
	(402) #	(100) %
A. Less than \$1.00 .....	-	-
B. \$1.00 - \$4.99 .....	1	*
C. \$5.00 - \$9.99 .....	4	1
D. \$10.00 - \$19.99 .....	13	3
E. \$20.00 or more .....	38	9
Don't know .....	3	1

\* = Less than 0.5%

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES						
CAMERA SURVEY: TOTAL RESPONDENTS FINAL						
Q're ID #	Q.1	Q.2 Verbatim	Q.3	TR WITH VALUES N = 383		
				VALUE	#	CUM %
102	same price			\$0.00	1	0.261097
107	same price			\$0.00	2	0.522193
120	same price			\$0.00	3	0.78329
133	same price			\$0.00	4	1.044386
136	same price			\$0.00	5	1.305483
138	same price			\$0.00	6	1.56658
139	same price			\$0.00	7	1.827676
141	same price			\$0.00	8	2.088773
166	same price			\$0.00	9	2.349869
171	same price			\$0.00	10	2.610966
175	same price			\$0.00	11	2.872063
208	same price			\$0.00	12	3.133159
212	same price			\$0.00	13	3.394256
215	same price			\$0.00	14	3.655352
224	same price			\$0.00	15	3.916449
231	same price			\$0.00	16	4.177546
242	same price			\$0.00	17	4.438642
290	same price			\$0.00	18	4.699739
310	same price			\$0.00	19	4.960836
312	same price			\$0.00	20	5.221932
315	same price			\$0.00	21	5.483029
322	same price			\$0.00	22	5.744125
326	same price			\$0.00	23	6.005222
337	same price			\$0.00	24	6.266319
359	same price			\$0.00	25	6.527415
383	same price			\$0.00	26	6.788512
384	same price			\$0.00	27	7.049608
404	same price			\$0.00	28	7.310705
406	same price			\$0.00	29	7.571802
419	same price			\$0.00	30	7.832898
421	same price			\$0.00	31	8.093995
425	same price			\$0.00	32	8.355091
430	same price			\$0.00	33	8.616188
436	same price			\$0.00	34	8.877285
437	same price			\$0.00	35	9.138381
443	same price			\$0.00	36	9.399478
444	same price			\$0.00	37	9.660574
449	same price			\$0.00	38	9.921671
452	same price			\$0.00	39	10.18277
458	same price			\$0.00	40	10.44386
488	same price			\$0.00	41	10.70496
494	same price			\$0.00	42	10.96606
500	same price			\$0.00	43	11.22715
505	same price			\$0.00	44	11.48825
528	same price			\$0.00	45	11.74935
462	cost less	Don't know	\$1.00 - \$4.99	\$1.00	46	12.01044
341	cost less	\$5.00		\$5.00	47	12.27154
108	cost less	Don't know	\$5.00 - \$9.99	\$5.00	48	12.53264
441	cost less	Don't know	\$5.00 - \$9.99	\$5.00	49	12.79373
518	cost less	Don't know	\$5.00 - \$9.99	\$5.00	50	13.05483
525	cost less	Don't know	\$5.00 - \$9.99	\$5.00	51	13.31593

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES						
CAMERA SURVEY: TOTAL RESPONDENTS FINAL						
Q're ID #	Q.1	Q.2 Verbatim	Q.3	TR WITH VALUES N = 383		
				VALUE	#	CUM %
244	cost less	\$10.00		\$10.00	52	13.57702
280	cost less	\$10.00		\$10.00	53	13.83812
281	cost less	\$10.00		\$10.00	54	14.09922
287	cost less	\$10.00		\$10.00	55	14.36031
104	cost less	Don't know	\$10.00 - \$19.99	\$10.00	56	14.62141
115	cost less	Don't know	\$10.00 - \$19.99	\$10.00	57	14.88251
135	cost less	Don't know	\$10.00 - \$19.99	\$10.00	58	15.1436
237	cost less	Don't know	\$10.00 - \$19.99	\$10.00	59	15.4047
238	cost less	Don't know	\$10.00 - \$19.99	\$10.00	60	15.6658
249	cost less	Don't know	\$10.00 - \$19.99	\$10.00	61	15.92689
276	cost less	Don't know	\$10.00 - \$19.99	\$10.00	62	16.18799
317	cost less	Don't know	\$10.00 - \$19.99	\$10.00	63	16.44909
410	cost less	Don't know	\$10.00 - \$19.99	\$10.00	64	16.71018
445	cost less	Don't know	\$10.00 - \$19.99	\$10.00	65	16.97128
446	cost less	Don't know	\$10.00 - \$19.99	\$10.00	66	17.23238
447	cost less	Don't know	\$10.00 - \$19.99	\$10.00	67	17.49347
522	cost less	Don't know	\$10.00 - \$19.99	\$10.00	68	17.75457
269	cost less	About 10 to 15 dollars less.		\$12.50	69	18.01567
300	cost less	\$15.00		\$15.00	70	18.27676
386	cost less	About 15 dollars		\$15.00	71	18.53786
388	cost less	Like maybe 19 something		\$19.00	72	18.79896
285	cost less	\$19.99		\$19.99	73	19.06005
174	cost less	20		\$20.00	74	19.32115
213	cost less	\$20.00		\$20.00	75	19.58225
247	cost less	\$20		\$20.00	76	19.84334
268	cost less	\$20.00		\$20.00	77	20.10444
277	cost less	\$20.00		\$20.00	78	20.36554
282	cost less	\$20.00		\$20.00	79	20.62663
298	cost less	\$20.00		\$20.00	80	20.88773
379	cost less	20.00		\$20.00	81	21.14883
398	cost less	20.00		\$20.00	82	21.40992
403	cost less	\$20		\$20.00	83	21.67102
420	cost less	20.00		\$20.00	84	21.93211
459	cost less	20.00		\$20.00	85	22.19321
468	cost less	\$20.00		\$20.00	86	22.45431
471	cost less	\$20.00		\$20.00	87	22.7154
491	cost less	20.00		\$20.00	88	22.9765
507	cost less	\$20.00		\$20.00	89	23.2376
532	cost less	\$20		\$20.00	90	23.49869
472	cost less	\$20 less		\$20.00	91	23.75979
304	cost less	\$20 or less		\$20.00	92	24.02089
170	cost less	20 dollars		\$20.00	93	24.28198
103	cost less	Don't know	\$20.00 or more	\$20.00	94	24.54308
106	cost less	Don't know	\$20.00 or more	\$20.00	95	24.80418
110	cost less	Don't know	\$20.00 or more	\$20.00	96	25.06527
111	cost less	Don't know	\$20.00 or more	\$20.00	97	25.32637
132	cost less	Don't know	\$20.00 or more	\$20.00	98	25.58747
147	cost less	Don't know	\$20.00 or more	\$20.00	99	25.84856
150	cost less	Don't know	\$20.00 or more	\$20.00	100	26.10966
189	cost less	Don't know	\$20.00 or more	\$20.00	101	26.37076
190	cost less	Don't know	\$20.00 or more	\$20.00	102	26.63185

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES						
CAMERA SURVEY: TOTAL RESPONDENTS FINAL						
Q're ID #	Q.1	Q.2 Verbatim	TR WITH VALUES N = 383			
			VALUE	#	CUM %	
193	cost less	Don't know	\$20.00 or more	\$20.00	103	26.89295
194	cost less	Don't know	\$20.00 or more	\$20.00	104	27.15405
195	cost less	Don't know	\$20.00 or more	\$20.00	105	27.41514
210	cost less	Don't know	\$20.00 or more	\$20.00	106	27.67624
211	cost less	Don't know	\$20.00 or more	\$20.00	107	27.93734
214	cost less	Don't know	\$20.00 or more	\$20.00	108	28.19843
226	cost less	Don't know	\$20.00 or more	\$20.00	109	28.45953
239	cost less	Don't know	\$20.00 or more	\$20.00	110	28.72063
243	cost less	Don't know	\$20.00 or more	\$20.00	111	28.98172
253	cost less	Don't know	\$20.00 or more	\$20.00	112	29.24282
258	cost less	Don't know	\$20.00 or more	\$20.00	113	29.50392
264	cost less	Don't know	\$20.00 or more	\$20.00	114	29.76501
303	cost less	Don't know	\$20.00 or more	\$20.00	115	30.02611
311	cost less	Don't know	\$20.00 or more	\$20.00	116	30.28721
316	cost less	Don't know	\$20.00 or more	\$20.00	117	30.5483
354	cost less	Don't know	\$20.00 or more	\$20.00	118	30.8094
362	cost less	Don't know	\$20.00 or more	\$20.00	119	31.0705
382	cost less	Don't know	\$20.00 or more	\$20.00	120	31.33159
393	cost less	Don't know	\$20.00 or more	\$20.00	121	31.59269
401	cost less	Don't know	\$20.00 or more	\$20.00	122	31.85379
423	cost less	Don't know	\$20.00 or more	\$20.00	123	32.11488
460	cost less	Don't know	\$20.00 or more	\$20.00	124	32.37598
464	cost less	Don't know	\$20.00 or more	\$20.00	125	32.63708
466	cost less	Don't know	\$20.00 or more	\$20.00	126	32.89817
473	cost less	Don't know	\$20.00 or more	\$20.00	127	33.15927
495	cost less	Don't know	\$20.00 or more	\$20.00	128	33.42037
503	cost less	Don't know	\$20.00 or more	\$20.00	129	33.68146
510	cost less	Don't know	\$20.00 or more	\$20.00	130	33.94256
515	cost less	Don't know	\$20.00 or more	\$20.00	131	34.20366
307	cost less	Twenty dollars		\$20.00	132	34.46475
146	cost less	\$25		\$25.00	133	34.72585
305	cost less	25		\$25.00	134	34.98695
358	cost less	\$25.00		\$25.00	135	35.24804
369	cost less	25.00		\$25.00	136	35.50914
397	cost less	25.00		\$25.00	137	35.77023
526	cost less	\$25.00		\$25.00	138	36.03133
509	cost less	\$20-30		\$25.00	139	36.29243
352	cost less	\$25 less		\$25.00	140	36.55352
167	cost less	20.00 to 30.00		\$25.00	141	36.81462
134	cost less	In between the 20s		\$25.00	142	37.07572
229	cost less	Maybe 25 dollars less.		\$25.00	143	37.33681
323	cost less	Probably 25 bucks		\$25.00	144	37.59791
380	cost less	29.95		\$29.95	145	37.85901
112	cost less	\$30		\$30.00	146	38.1201
122	cost less	\$30		\$30.00	147	38.3812
187	cost less	30		\$30.00	148	38.6423
204	cost less	\$30.00		\$30.00	149	38.90339
205	cost less	\$30.00		\$30.00	150	39.16449
209	cost less	\$30.00		\$30.00	151	39.42559
240	cost less	\$30		\$30.00	152	39.68668
255	cost less	\$30.00		\$30.00	153	39.94778

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES						
CAMERA SURVEY: TOTAL RESPONDENTS FINAL						
Q're ID #	Q.1	Q.2 Verbatim	Q.3	TR WITH VALUES N = 383		
				VALUE	#	CUM %
308	cost less	30		\$30.00	154	40.20888
356	cost less	\$30		\$30.00	155	40.46997
367	cost less	30.00		\$30.00	156	40.73107
375	cost less	30.00		\$30.00	157	40.99217
409	cost less	\$30.00		\$30.00	158	41.25326
435	cost less	30.00		\$30.00	159	41.51436
448	cost less	\$30.00		\$30.00	160	41.77546
450	cost less	\$30.00		\$30.00	161	42.03655
454	cost less	30.00		\$30.00	162	42.29765
504	cost less	\$30.00		\$30.00	163	42.55875
387	cost less	Probably 30 bucks		\$30.00	164	42.81984
411	cost less	30.00 - 40.00 bucks		\$35.00	165	43.08094
453	cost less	About 35.00		\$35.00	166	43.34204
232	cost less	I think it would cost thirty five dollars less.		\$35.00	167	43.60313
131	cost less	Probably 20-50 dollars		\$35.00	168	43.86423
267	cost less	\$25.00 to \$50.00		\$37.50	169	44.12533
455	cost less	25 to 50 bucks difference		\$37.50	170	44.38642
266	cost less	25 to 50 dollars less		\$37.50	171	44.64752
376	cost less	25.00 to 50.00		\$37.50	172	44.90862
306	cost less	35 or 40 less		\$37.50	173	45.16971
119	cost less	\$40		\$40.00	174	45.43081
199	cost less	\$40.00		\$40.00	175	45.69191
241	cost less	\$40.00		\$40.00	176	45.953
251	cost less	\$40		\$40.00	177	46.2141
262	cost less	\$40		\$40.00	178	46.4752
355	cost less	\$40		\$40.00	179	46.73629
461	cost less	\$40 less		\$40.00	180	46.99739
465	cost less	\$40 less		\$40.00	181	47.25849
377	cost less	40.00 less		\$40.00	182	47.51958
381	cost less	40.00 less		\$40.00	183	47.78068
299	cost less	Probably 40 bucks		\$40.00	184	48.04178
176	cost less	Probably 40 dollars		\$40.00	185	48.30287
350	cost less	\$45 less		\$45.00	186	48.56397
309	cost less	40 or 50 less		\$45.00	187	48.82507
234	cost less	40/50 dollars less		\$45.00	188	49.08616
467	cost less	\$49.95		\$49.95	189	49.34726
186	cost less	49.99		\$49.99	190	49.60836
114	cost less	\$50		\$50.00	191	49.86945
116	cost less	\$50		\$50.00	192	50.13055
117	cost less	\$50		\$50.00	193	50.39164
118	cost less	\$50		\$50.00	194	50.65274
125	cost less	\$50		\$50.00	195	50.91384
151	cost less	\$50		\$50.00	196	51.17493
153	cost less	\$50		\$50.00	197	51.43603
155	cost less	\$50		\$50.00	198	51.69713
164	cost less	50		\$50.00	199	51.95822
168	cost less	\$50		\$50.00	200	52.21932
169	cost less	50		\$50.00	201	52.48042
181	cost less	50		\$50.00	202	52.74151
196	cost less	\$50.00		\$50.00	203	53.00261
200	cost less	\$50.00		\$50.00	204	53.26371

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
Q're ID #	Q.1	Q.2 Verbatim	TR WITH VALUES N = 383		
			VALUE	#	CUM %
207	cost less	\$50.00	\$50.00	205	53.5248
252	cost less	\$50	\$50.00	206	53.7859
256	cost less	\$50	\$50.00	207	54.047
260	cost less	\$50	\$50.00	208	54.30809
261	cost less	\$50	\$50.00	209	54.56919
265	cost less	\$50	\$50.00	210	54.83029
271	cost less	\$50.00	\$50.00	211	55.09138
272	cost less	\$50.00	\$50.00	212	55.35248
273	cost less	\$50.00	\$50.00	213	55.61358
275	cost less	\$50.00	\$50.00	214	55.87467
284	cost less	\$50.00	\$50.00	215	56.13577
302	cost less	\$50.00	\$50.00	216	56.39687
334	cost less	\$50	\$50.00	217	56.65796
347	cost less	\$50	\$50.00	218	56.91906
348	cost less	\$50	\$50.00	219	57.18016
361	cost less	50.00	\$50.00	220	57.44125
363	cost less	50.00	\$50.00	221	57.70235
365	cost less	50.00	\$50.00	222	57.96345
366	cost less	50.00	\$50.00	223	58.22454
368	cost less	50.00	\$50.00	224	58.48564
370	cost less	50.00	\$50.00	225	58.74674
371	cost less	50.00	\$50.00	226	59.00783
372	cost less	50.00	\$50.00	227	59.26893
374	cost less	50.00	\$50.00	228	59.53003
396	cost less	50.00	\$50.00	229	59.79112
400	cost less	50.00	\$50.00	230	60.05222
405	cost less	\$50	\$50.00	231	60.31332
407	cost less	\$50	\$50.00	232	60.57441
408	cost less	\$50.00	\$50.00	233	60.83551
412	cost less	\$50.00	\$50.00	234	61.09661
413	cost less	\$50	\$50.00	235	61.3577
424	cost less	\$50.00	\$50.00	236	61.6188
426	cost less	\$50.00	\$50.00	237	61.8799
428	cost less	\$50.00	\$50.00	238	62.14099
433	cost less	\$50.00	\$50.00	239	62.40209
438	cost less	\$50.00	\$50.00	240	62.66319
451	cost less	\$50.00	\$50.00	241	62.92428
469	cost less	\$50.00	\$50.00	242	63.18538
470	cost less	\$50.00	\$50.00	243	63.44648
479	cost less	50.00	\$50.00	244	63.70757
492	cost less	50.00	\$50.00	245	63.96867
496	cost less	\$50.00	\$50.00	246	64.22977
506	cost less	\$50.00	\$50.00	247	64.49086
508	cost less	\$50.00	\$50.00	248	64.75196
512	cost less	\$50	\$50.00	249	65.01305
516	cost less	50.00	\$50.00	250	65.27415
527	cost less	\$50.00	\$50.00	251	65.53525
529	cost less	\$50.00	\$50.00	252	65.79634
531	cost less	\$50.00	\$50.00	253	66.05744
535	cost less	\$50.00	\$50.00	254	66.31854
538	cost less	\$50.00	\$50.00	255	66.57963

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
Q're ID #	Q.1	Q.2 Verbatim	TR WITH VALUES N = 383		
			VALUE	#	CUM %
351	cost less	\$50 less	\$50.00	256	66.84073
227	cost less	\$50.00 Less	\$50.00	257	67.10183
270	cost less	\$50.00 less	\$50.00	258	67.36292
502	cost less	\$50.00 less	\$50.00	259	67.62402
519	cost less	\$50.00 less	\$50.00	260	67.88512
521	cost less	\$50.00 less	\$50.00	261	68.14621
313	cost less	50 bucks	\$50.00	262	68.40731
101	cost less	50 dollars	\$50.00	263	68.66841
236	cost less	50 dollars	\$50.00	264	68.9295
137	cost less	50 dollars less	\$50.00	265	69.1906
178	cost less	50 dollars less	\$50.00	266	69.4517
378	cost less	50.00 at least	\$50.00	267	69.71279
219	cost less	50.00 Less	\$50.00	268	69.97389
235	cost less	About \$50 or less	\$50.00	269	70.23499
172	cost less	About 50 dollars less	\$50.00	270	70.49608
263	cost less	About fifty bucks	\$50.00	271	70.75718
325	cost less	At least 50 bucks	\$50.00	272	71.01828
324	cost less	I think it would drop 50 bucks	\$50.00	273	71.27937
230	cost less	It would be fifty dollars less.	\$50.00	274	71.54047
537	cost less	Like 50 bucks	\$50.00	275	71.80157
130	cost less	maybe \$50	\$50.00	276	72.06266
498	cost less	Probably \$50 less	\$50.00	277	72.32376
390	cost less	Probably about 50 bucks	\$50.00	278	72.58486
320	cost less	Probably like 50 dollars	\$50.00	279	72.84595
127	cost less	\$55	\$55.00	280	73.10705
254	cost less	\$50 - \$60	\$55.00	281	73.36815
533	cost less	\$50 - \$60	\$55.00	282	73.62924
463	cost less	50 or 60 less	\$55.00	283	73.89034
233	cost less	It would cost 50 or 60 dollars less.	\$56.00	284	74.15144
163	cost less	60	\$60.00	285	74.41253
183	cost less	60	\$60.00	286	74.67363
201	cost less	\$60.00	\$60.00	287	74.93473
477	cost less	60.00	\$60.00	288	75.19582
385	cost less	50 to \$70 less	\$60.00	289	75.45692
319	cost less	Maybe 60 bucks less	\$60.00	290	75.71802
514	cost less	\$50-\$75	\$62.50	291	75.97911
245	cost less	25% less	\$62.50	292	76.24021
259	cost less	50 - 75 less	\$62.50	293	76.50131
457	cost less	I'd say 65 dollars	\$65.00	294	76.7624
161	cost less	\$70	\$70.00	295	77.0235
198	cost less	\$70.00	\$70.00	296	77.2846
328	cost less	\$70	\$70.00	297	77.54569
493	cost less	\$70.00	\$70.00	298	77.80679
124	cost less	About \$70	\$70.00	299	78.06789
154	cost less	\$75	\$75.00	300	78.32898
156	cost less	\$75	\$75.00	301	78.59008
184	cost less	75	\$75.00	302	78.85117
346	cost less	\$75	\$75.00	303	79.11227
357	cost less	\$75	\$75.00	304	79.37337
360	cost less	75.00	\$75.00	305	79.63446
402	cost less	\$75	\$75.00	306	79.89556

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
Q're ID #	Q.1	Q.2 Verbatim	TR WITH VALUES N = 383		
			VALUE	#	CUM %
427	cost less	\$75.00	\$75.00	307	80.15666
431	cost less	\$75.00	\$75.00	308	80.41775
399	cost less	\$70 - \$80	\$75.00	309	80.67885
343	cost less	\$75 less	\$75.00	310	80.93995
318	cost less	About 75.00	\$75.00	311	81.20104
297	cost less	Maybe about \$75	\$75.00	312	81.46214
129	cost less	maybe like 50 to 100 dollars	\$75.00	313	81.72324
389	cost less	Maybe like 50 to 100 dollars less	\$75.00	314	81.98433
391	cost less	Probably 75 bucks	\$75.00	315	82.24543
173	cost less	Probably 75 dollars	\$75.00	316	82.50653
392	cost less	Probably about 75 dollars less	\$75.00	317	82.76762
145	cost less	\$79.99 less	\$79.99	318	83.02872
121	cost less	\$80	\$80.00	319	83.28982
179	cost less	\$80.00	\$80.00	320	83.55091
327	cost less	\$80	\$80.00	321	83.81201
330	cost less	\$80	\$80.00	322	84.07311
331	cost less	\$80	\$80.00	323	84.3342
333	cost less	\$80	\$80.00	324	84.5953
336	cost less	\$80	\$80.00	325	84.8564
497	cost less	\$80	\$80.00	326	85.11749
345	cost less	\$80 less	\$80.00	327	85.37859
228	cost less	\$80.00 less	\$80.00	328	85.63969
536	cost less	Maybe like \$80	\$80.00	329	85.90078
335	cost less	\$90	\$90.00	330	86.16188
180	cost less	\$80 to \$100	\$90.00	331	86.42298
394	cost less	About 80 to a hundred bucks	\$90.00	332	86.68407
123	cost less	\$100	\$100.00	333	86.94517
126	cost less	\$100	\$100.00	334	87.20627
128	cost less	\$100	\$100.00	335	87.46736
143	cost less	\$100	\$100.00	336	87.72846
144	cost less	\$100	\$100.00	337	87.98956
148	cost less	\$100	\$100.00	338	88.25065
149	cost less	\$100	\$100.00	339	88.51175
152	cost less	\$100	\$100.00	340	88.77285
159	cost less	\$100	\$100.00	341	89.03394
162	cost less	\$100	\$100.00	342	89.29504
165	cost less	100	\$100.00	343	89.55614
177	cost less	100	\$100.00	344	89.81723
185	cost less	100	\$100.00	345	90.07833
191	cost less	\$100	\$100.00	346	90.33943
203	cost less	\$100.00	\$100.00	347	90.60052
206	cost less	\$100.00	\$100.00	348	90.86162
246	cost less	\$100	\$100.00	349	91.12272
248	cost less	\$100	\$100.00	350	91.38381
250	cost less	\$100	\$100.00	351	91.64491
329	cost less	\$100	\$100.00	352	91.90601
332	cost less	\$100	\$100.00	353	92.1671
339	cost less	\$100	\$100.00	354	92.4282
342	cost less	\$100	\$100.00	355	92.6893
353	cost less	\$100	\$100.00	356	92.95039
373	cost less	100.00	\$100.00	357	93.21149

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
			TR WITH VALUES N = 383		
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	#
414	cost less	\$100.00		\$100.00	358
415	cost less	\$100.00		\$100.00	359
429	cost less	\$100.00		\$100.00	360
432	cost less	\$100.00		\$100.00	361
434	cost less	\$100.00		\$100.00	362
442	cost less	\$100		\$100.00	363
490	cost less	100.00		\$100.00	364
530	cost less	\$100.00		\$100.00	365
534	cost less	\$100		\$100.00	366
539	cost less	\$100.00		\$100.00	367
344	cost less	\$100 less		\$100.00	368
349	cost less	\$100 less		\$100.00	369
257	cost less	\$100.00 less		\$100.00	370
517	cost less	\$100.00 less		\$100.00	371
524	cost less	\$100.00 less		\$100.00	372
395	cost less	100 bucks less		\$100.00	373
182	cost less	About 100 dollars less		\$100.00	374
523	cost less	\$125 less		\$125.00	375
501	cost less	\$139.95 less		\$139.95	376
158	cost less	\$150		\$150.00	377
202	cost less	\$150		\$150.00	378
288	cost less	\$150.00		\$150.00	379
364	cost less	150.00		\$150.00	380
340	cost less	About \$150 less		\$150.00	381
220	cost less	Probally [sic] 150.00 less then the one with the technology.		\$150.00	382
511	cost less	150-200		\$175.00	383
			SUM:	\$17,207.32	
			MEAN:	\$44.93	
			MEDIAN:	\$50.00	

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES						
CAMERA SURVEY: TOTAL RESPONDENTS FINAL				TR WITH VALUES N = 383		
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	#	CUM %
<b>FOLLOWING RESP NOT IN MEAN/MEDIAN (Q.1/2 = Don't know)</b>						
314	dk			NA		
321	dk			NA		
422	dk			NA		
478	dk			NA		
338	dk			NA		
439	dk			NA		
113	dk			NA		
222	dk			NA		
223	dk			NA		
109	dk			NA		
142	dk			NA		
221	dk			NA		
475	cost less	Don't know	Don't know	NA		
476	cost less	Don't know	Don't know	NA		
160	cost less	Don't know	Don't know	NA		
<b>FOLLOWING RESP NOT IN MEAN/MEDIAN (Q.2 = questionable response)</b>						
105	cost less	\$200.00		NA		
456	cost less	Maybe like 200, probably 200.		NA		
274	cost less	\$225.00		NA		
188	cost less	249 dollars		NA		

# Exhibit M

**REDACTED  
IN ITS ENTIRETY**

# Exhibit N

**Walter McCullough**

Page 1

1

2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE DISTRICT OF DELAWARE

4

5 POLAROID CORPORATION,

6

7 Plaintiff,

8

9 vs. NO. 6-738 (SLR)

10

11 HEWLETT-PACKARD COMPANY,

12

13 Defendant.

14 -----)

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VIDEOTAPED DEPOSITION OF

25

WALTER J. McCULLOUGH

26

New York, New York

27

Tuesday, May 6, 2008

28

29

30

31

32

33

34

Reported by:

SHAUNA STOLTZ-LAURIE

CSR NO. 810490

JOB NO. 202738

## Walter McCullough

<p>1 2 3 4 5           May 1, 2008 6           9:08 a.m. 7 8           Videotaped deposition of WALTER J. 9           McCULLOUGH, held at the offices of 10          Kirkland &amp; Ellis LLP, 153 East 53rd 11          Street, New York, New York, pursuant to 12          notice, before Shauna Stoltz-Laurie, a 13          Notary Public of the State of New York. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 2</p> <p>1 2           THE VIDEOGRAPHER: This is tape 3           number one of the videotaped deposition 4           of Walter J. McCullough in the matter of 5           Polaroid Corporation versus 6           Hewlett-Packard Company, in the United 7           States District Court for the District 8           of Delaware, CA number 6-738 (SLR). 9           This deposition is being held at 10          Kirkland &amp; Ellis LLP, 153 East 53rd 11          Street, New York, New York on May 6, 12          2008. The time on the video screen is 13          9:09 a.m. 14          My name is Lee Bowry, I am the 15          legal videographer with Shari Moss &amp; 16          Associates. The court reporter is 17          Shauna Stoltz-Laurie. 18          Will counsel please introduce 19          themselves for the record. 20          MR. BUCHANAN: Good morning. My 21          name is Robert Buchanan from Choate Hall 22          &amp; Stewart. I represent Hewlett-Packard 23          Company, and I'll be conducting the 24          deposition. 25          MS. KINGSBURY: Good morning. My</p>
<p>1 2          A P P E A R A N C E S: 3 4          Kirkland &amp; Ellis LLP 5          Attorneys for Plaintiff 6          200 East Randolph Drive 7          Chicago, Illinois 60601 8          BY: COLBY ANNE KINGSBURY, ESQ. 9 10         CHOATE HALL &amp; STEWART LLP 11         Attorneys for Defendant 12         Two International Place 13         Boston, Massachusetts 02110 14         BY: ROBERT M. BUCHANAN, JR., ESQ. 15 16         ALSO PRESENT: 17         LEE BOWRY, Videographer 18 19 20 21 22 23 24 25</p>	<p>Page 3</p> <p>1 2          McCullough 3          name is Colby Anne Kingsbury. I'm from 4          Kirkland &amp; Ellis, and I represent 5          Polaroid, and I'm here on behalf of Mr. 6          McCullough as well. 7 8          THE VIDEOGRAPHER: Will the court 9          reporter please swear in the witness. 10         W A L T E R J. M c C U L L O U G H , 11         called as a witness, having been duly 12         sworn by a Notary Public, was examined 13         and testified as follows: 14         EXAMINATION BY 15         MR. BUCHANAN: 16         Q. Good morning, Mr. McCullough. 17         A. Good morning, Mr. Buchanan. 18         Q. We met earlier. 19         A. Would you spell your last name in 20         full, please? 21         A. Yes. M-c capital C-u-l-l-o-u-g-h. 22         Q. And have you been retained on 23         behalf of Polaroid in this case? 24         A. Yes, I have. 25         Q. And have you been retained by the 26         firm of Kirkland &amp; Ellis on behalf of 27         Polaroid? 28</p>

2 (Pages 2 to 5)

## Walter McCullough

<p>1       McCullough  2 were able to put that out of your mind  3 entirely when you wrote your report about  4 printers.  5       A. Yes.  6       It's completely unrelated, in terms  7 of my point of view.  8       Q. And what do you mean, they are  9 unrelated?  10      A. They're two completely different  11 surveys on two different products, and when I  12 was working on the printer report I was  13 thinking in terms of the results of the two  14 printer surveys I did; I was not thinking at  15 all about the camera survey, because that was  16 -- from my point of view, I was told that  17 this was taken off -- off the table, so to  18 speak.  19      Q. Did you yourself design the  20 questions that were asked as a printer  21 survey?  22      A. Yes.  23      Q. Did you yourself design the  24 questions that were asked in the camera  25 survey?</p>	<p>Page 18</p> <p>1       McCullough  2 sought people to ask questions about the  3 printers, also seek people to ask -- answer  4 questions about the cameras?  5       A. Let me think about that.  6       I think they were separate  7 screeners. But it goes back a ways, so I'm  8 not positive. I think they were separately  9 done. But it was an along time ago, and I  10 forgot the detail of it.  11      Q. Well, were there sent to you any  12 documents that reflect responses that people  13 indicative about cameras?  14      A. You mean -- you mean the  15 interviews?  16      Q. Yes.  17      A. Yes.  18      Q. And so -- now, about printers, I've  19 received from counsel about what in my --  20 what fills about one full box of cartons of  21 questionnaire responses --  22      A. Right.  23      Q. -- containing the printer survey.  24      A. Right.  25      Q. Are you familiar with those?</p>
<p>1       McCullough  2       A. Yes.  3       Q. Did you -- when did you work on the  4 design of questions for the printer survey,  5 which began in late January '08?  6       A. Sometime in January. I can't  7 recall exact dates.  8       Q. And was it also in January that you  9 worked on designing the questions that were  10 asked this the camera survey?  11      A. That's correct.  12      Q. Did you work on both of those on  13 the same days in January?  14      A. It could have been.  15      Q. Were they -- were the initial  16 interviews conducted in the same shopping  17 malls?  18      A. Yes, they were.  19      Q. Were the initial shopping --  20 interviews conducted by the same interviewing  21 -- interviewers in the same shopping malls?  22      A. Some may have been and some may  23 have been different interviewers, depending  24 on the mall situation.  25      Q. Did the interviewers, when they</p>	<p>Page 19</p> <p>1       McCullough  2       A. Yes.  3       Q. And those came to your firm  4 initially?  5       A. The original ones did, yes.  6       Q. And then you then provided those to  7 counsel.  8       A. Correct.  9       Q. Did you similarly receive  10 questionnaire responses pertaining to  11 responses about the cameras?  12      A. From the field people that were  13 getting -- yes, I did.  14      Q. So does your firm have those in  15 your possession?  16      A. Yes, we do.  17      Q. And have you provided those to  18 counsel?  19      A. They did not ask for them.  20      Q. So you still have them?  21      A. I still have them in my office.  22      Q. How many discussions did you have  23 with counsel about the preliminary results of  24 the camera questions?  25      A. I think probably one.</p>

6 (Pages 18 to 21)

## Walter McCullough

<p>1           McCullough  2 hundred dollars, and that would be the whole  3 price.  4   A. Correct.  5   Q. And let's look, if we -- just  6 looking at the fact sheet on the 5610, you'll  7 agree with me, won't you, that the printer  8 has a number of features? It has --  9   Can we take a look at that?  10   A. Sure.  11   That's number C? Okay.  12   Q. The first bullet says that it  13 "prints in copies up to 20 pages per minute  14 in black and up to 13 per minute in color."  15   A. Okay.  16   Q. So that's one feature of the  17 printer that might be of interest to some  18 people, yes?  19   A. Well, I think by definition, every  20 printer has a speed, so I'm not sure if  21 that's an extra feature. That looks like  22 it's just a mechanical description of the  23 printer printing.  24   Q. The next one says that it copy --  25 "automatically copies and scans faxes."</p>	<p>Page 106</p> <p>1           McCullough  2 is to them, but even, you know, assuming that  3 you could do that, and it would be a  4 reasonable task, which I'm not sure it would  5 be, it's possible that the people could  6 decide values to that, and I don't know what  7 the value would be, though.  8   Q. Given all the features that this  9 printer has as outlined on the fact sheet,  10 isn't it unreasonable on its face to assert  11 that the adaptive lighting feature in  12 particular accounts for \$50 of the hundred  13 dollars of value of the printer?  14   A. It's in the eyes of beholder.  15 That's what the consumer actually told me  16 they thought it was worth.  17   Q. In your judgment, that's not  18 unreasonable on its face.  19   A. Not unreasonable on its face, no.  20   Q. If you --  21    MR. BUCHANAN: Strike that.  22   Q. From your own experience in using  23 devices of this kind, do you find that  24 unreasonable, \$50 out of the hundred for that  25 one feature?</p>
<p>1           McCullough  2 That's a feature that might be of interest to  3 some people, yes?  4   A. Yes, but it also is implicit in an  5 All-In-One. That's what an All-In-One means.  6   (Discussion off the record.)  7   Q. So to some people it might be  8 particularly of interest that this is an  9 All-In-One as opposed to a stand-alone  10 printer or a stand-alone copier or a  11 stand-alone fax machine.  12   A. Right.  13   And that's in the title of the  14 printer.  15   Q. Yes.  16   So there are a variety of features  17 that you could ask about in a survey, yes?  18   A. Yes.  19   Q. And if you did ask about, let's  20 say, ten features, would it be reasonable to  21 expect that people would have assigned some  22 dollar number to each of the ten?  23   A. I'm not sure that the ten might be  24 somewhat overwhelming to people in terms of  25 trying to come up with their -- the value it</p>	<p>Page 107</p> <p>1           McCullough  2 A. I really don't have -- it's -- it's  3 -- I can't approach this anymore as a  4 consumer, because I've gotten too involved in  5 it, so I really can't answer that.  6   Q. Let me ask you to turn back to the  7 main section of the report, and let me ask to  8 look at page eight.  9   A. Okay.  10   Q. If I understand this correctly, for  11 the people who were asked about the  12 Photosmart C6180 printer --  13    MR. BUCHANAN: Strike that.  14   Q. The -- the left column reports to  15 me findings of the people who were asked  16 about that printer, yes?  17   A. The C6180, correct.  18   Q. And that had a price of one penny  19 less than \$300.  20   A. That's correct.  21   Q. And if I look down at the bottom,  22 the median dollar amount answer from the  23 respondents as you calculated was \$50.  24   A. That's correct.  25   Q. And then on the right reports the</p>

28 (Pages 106 to 109)